

**Before the**  
**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, D.C. 20554**

In the Matter of	)	
Federal-State Joint Board on	)	CC Docket No. 96.45
Universal Service	)	
1998 Biennial Regulatory Review -	)	CC Docket No. 98-171
Streamlined Contributor Reporting	)	
Requirements Associated with Administration	)	
Of Telecommunications Relay Service, North	)	
American Numbering Plan, Local Number	)	
Portability, and Universal Service Support	)	
Mechanisms	)	
Telecommunications Services for Individuals	)	CC Docket No. 90-571
With Hearing and Speech Disabilities, and the	)	
Americans with Disabilities Act of 1990	)	
Administration of the North American	)	CC Docket No. 92-237
Numbering Plan and North American	)	NSD File No. L-00-72
Numbering Plan Cost Recovery Contribution	)	
Factor and Fund Size	)	
Number Resource Optimization	)	CC Docket No. 99-200
Telephone Number Portability	)	CC Docket No. 95-116
Truth-in-Billing and Billing Format	)	CC Docket No. 98-170

**REPLY COMMENTS**  
**OF**  
**ONSTAR CORPORATION**

OnStar Corporation hereby submits these reply comments in response to the Commission's Public Notice released February 26, 2002 in the above captioned matters.

In its initial comments, OnStar expressed concern that a non-revenue based USF assessment system such as a connection-based system creates equity concerns for low price, low call volume services and prepaid services such as OnStar.

OnStar notes that SBC and BellSouth have filed an alternative proposal. OnStar believes that proposal generates many of the same equity concerns discussed in OnStar's Comments filed in this proceeding.

OnStar continues to believe that a revenue-based system with safe harbors offers the approach with the fewest equity concerns.

OnStar appreciates the Commission's consideration of these issues as it evaluates the USF issue.

Respectively submitted,

Kenneth D. Enborg  
Vice President and General Counsel  
248-588-3522

William L. Ball  
Vice President-Public Policy  
248-588-2815

1400 Stephenson Highway  
Troy, MI 48083-1189

May 13, 2002